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17 **UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION**

19 **CHASOM BROWN, et al.,**
20 Plaintiffs,
21 v.
22 **GOOGLE LLC,**
23 Defendant.

24 Case No. 5:20-cv-03664-LHK-SVK

25 **JOINT ADMINISTRATIVE MOTION
26 REQUESTING SCHEDULING ORDER
27 FOR JOINT STATEMENTS ON
28 DISCOVERY DISPUTES**

29 Judge: Honorable Susan van Keulen

1 Pursuant to Civil Local Rule 7-11, Plaintiffs and Defendant, Google LLC, submit this
2 administrative motion for an order scheduling briefing regarding discovery disputes on which the
3 parties have reached impasse. Namely, Plaintiffs are seeking the apex depositions of Alphabet and
4 Google's Chief Executive Officer Sundar Pichai and Chief Marketing Officer Lorraine Twohill and
5 Google opposes the depositions. The parties have met and conferred and reached impasse. Mindful
6 of the Court's recent *Calhoun* Order, the parties wish to seek guidance from the Court on how it
7 would prefer the parties brief these disputes. The parties have provided an agreed-to briefing
8 schedule below for the Court's consideration.

9 Additionally, the parties are continuing to meet and confer regarding disputes on Google's
10 responses to several of Plaintiffs' Interrogatories. The parties are hopeful agreement can be reached.
11 If not, and with permission of the Court, the parties anticipate briefing any outstanding issues related
12 to Interrogatory Nos. 8 and 11-17.

13 Plaintiffs and Google hereby move the Court for entry of an order setting the following
14 briefing schedule:

15 1. The Parties are to file a single, joint letter brief not to exceed five pages regarding
16 the apex deposition of Ms. Lorraine Twohill at 8:30 p.m. Pacific Time on December
17 15, 2021, with an option for both Parties to stipulate to a slightly later filing, if
18 necessary.

19 2. The Parties are to file a single, joint letter brief not to exceed five pages regarding
20 the apex deposition of Mr. Sundar Pichai at 5:30 p.m. Pacific Time on December 17,
21 2021, with an option for both Parties to stipulate to a slightly later filing, if necessary.

22 3. The Parties are to continue meeting and conferring regarding Google's responses to
23 Plaintiffs' Interrogatory Nos. 8 and 11-17. If the Parties are unable to reach a
24 resolution, the Parties may file a single, joint letter brief not to exceed five pages.

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1 DATED: December 14, 2021

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Attorneys for Plaintiffs

ATTESTATION OF CONCURRENCE

I am the ECF user whose ID and password are being used to file this Joint Administrative Motion Requesting Scheduling Order For Joint Statements On Discovery Disputes. I hereby attest that each of the signatories identified above has concurred in the filing of this document.

Dated: December 14, 2021

By /s/ Andrew H. Schapiro

Andrew H. Schapiro

Counsel on behalf of Google